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19 ATTORNEYS FOR HALL CA-NV, LLC

20
21 **UNITED STATES DISTRICT COURT**
22 **DISTRICT OF NEVADA**
23

24 In Re:

25 NEW CAL NEVA LODGE, LLC,
26 A Nevada Limited-Liability Company;

27 Debtor

28 HALL CA-NV, LLC, a Texas Limited-
29 Liability Company,

30 Appellant,

31 vs.

32 LAWRENCE INVESTMENT, LLC;
33 OFFICIAL COMMITTEE OF
34 UNSECURED CREDITORS,

35 Appellees.

36 **Case No:** 3:17-cv-00636-RCJ

37 **US Bankruptcy Court, District of**
38 **Nevada Case No:** BK-16-51282-gwz
39 **Appeal Ref. No.:** 17-49

40 **HALL CA-NV, LLC'S CERTIFICATE**
41 **OF COMPLIANCE WITH**
42 **SUPERSEDEAS BOND ORDER**

HALL C-NC, LLC'S CERTIFICATE OF COMPLIANCE WITH
SUPERSEDEAS BOND ORDER

TO THE HONORABLE U.S. DISTRICT JUDGE ROBERT C. JONES:

Hall CA-NV, LLC, Appellant, files this Certificate of Compliance with Supersedeas Bond Order and would respectfully show the Court the following:

1. On October 25, 2017 this Court conducted a hearing regarding Hall CA-NV, LLC's ("Hall") *Expedited Motion to Stay Confirmation Order Pending Appeal*, the Court stayed the *Order Confirming First Amended Plan of Liquidation for New Cal-Neva Lodge, LLC Jointly Proposed by Lawrence Investments, LLC and the Official Committee of Unsecured Creditors Dated August 16, 2017* ("Confirmation Order") and *Order Conditionally Granting Motion to Approve Non-Material Plan Modification Hall* ("Plan Modification Order") pending appeal. Nathan J. Aman and Frank J. Wright appeared on behalf of Hall, Courtney Miller O'Mara and Shirley S. Cho appeared on behalf of the Official Committee of the Unsecured Creditors, Eric Goldberg appeared on behalf of Lawrence Investments, LLC, counsel appeared on behalf of Savage & Son, Inc. and George Stuart Yount, and Dawn Cica appeared on behalf of the Penta Building Group, Inc.

1. At the hearing the Court immediately granted Hall's Stay Motion but imposed certain requirements upon Hall for a continuation of the stay. Hall is required to post a supersedeas bond during the pendency of the appeal which shall consist of: (1) avoiding the non-judicial foreclosure of a home owned by 9898 Lake, LLC located at 9898 Lake Street, Kings Beach, California ("Fairwinds Estate"), including, without limitation, curing the past due balance on the loan with Capital One Bank secured by a lien on the Fairwinds Estate in the amount of approximately \$580,603.90 as of the date of the Confirmation Hearing; (2) maintaining the Fairwinds Estate's monthly mortgage payments to Capital One Bank in the approximate amount of \$25,841.22 throughout the pendency of this appeal; and (3) maintaining

1 the operating and maintenance costs generally consisting of insurance, taxes, security, utilities,
2 snow removal and storage of FF&E associated with the Cal-Neva Resort Hotel & Casino
3 throughout the pendency of this appeal.

4 2. Hall has not yet received a transcript of the hearing but does fully intend to
5 comply with the requirements imposed by the Court. Attached is a proposed form of
6 Supersedeas Bond Order.

7
8 3. Hall hereby certifies to the Court that Hall will comply with the terms of the
9 attached Supersedeas Bond Order upon its entry.

10 **WHEREFORE, PREMISES CONSIDERED,** Hall requests that the Court enter the
11 attached form of the Supersedeas Bond Order and accept Hall's certification as set forth herein
12 that Hall will comply with the terms thereof.

13
14 DATED: October 27, 2017

Respectfully submitted,

15 **GARDERE WYNNE SEWELL LLP**

16 By: /s/ Frank J Wright
17 Frank J. Wright (TX Bar No. 22028800)
(by pro hac vice, verified petition)

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24 and

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ATTORNEYS FOR HALL CA-NV, LLC

CERTIFICATE OF SERVICE

I the undersigned, hereby certify that on the 27th day of October, 2017, the foregoing document was served on all parties consenting to electronic service in this case *via* the Court's CM/ECF system of the District Court.

/s/ Frank J. Wright

Frank J. Wright

The foregoing document has been delivered by other means to:

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